November 8, 2000

Federal Communication Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

RE: CC DOCKET NO. 94-102 REPORT AN IMPLEMENTATION OF WIRELESS E911

Dear Sir:

In accordance with the Third Report and Order, 14FCC Red 17388 (1999) related to E911, NewComm

Wireless Services, Inc. (dba MoviStar) wants to state its position as of today in relation to this matter.

Given the possible solutions, MoviStar has decided to implement CDMA Lucent Technologies E911

Network solution which is best described as: the E911 Phase 2 via Network-base Geolocation feature

which provides the capability of determining caller location based on latitude and longitude.   This

information enables emergency personnel to more quickly locate the mobile subscriber than using

cell/sector information. For the deployment of this feature, it is necessary a global test plan to verify if this

solution accomplishes the FCC standards. The description of the testing method to be used has not been

delivered by Lucent Technologies for evaluation based on our topology and coverage of the island.

Taking into consideration the documents of the Lucent Technologies E911 Network solution, for the

deployment of E911 in MoviStar Network, it is necessary to implement hardware and software changes.

The hardware changes emphasize the need to upgrade our Intelligent Network, where E911 application

will reside, to a triggers solution in order to route the calls with all the information necessary to the PSAP.

The interface with the local PSAP is not defined yet, because as of today the local PSAP has not defined

their request and implementation date. MoviStar will comply with 50% of phase II within 6 months of

PSAP request and a 100% within 18 months. In term of our network will be necessary to install new

hardware and new software on the Mobile Switching Center (MSC), specifically on the Executive Cellular

Processor (ECP), which will be loaded with new information. Since no requests have been defined by the

PSAP no PDE(Position Determination Equipment) vendor has been chosen at the time. The required

softwares are "Routing Service for Emergency Calls", "Enhance 911", E911 Call Routing Enhancement" and will need the activation of a feature call "E911 Dialing Class Enhancement Feature", which in conjunction with the Intelligent Network triggers solution will deliver the assumed information, based on the FCC requirements that the local PSAP is expecting.

For further details on this matter, MoviStar contact information is the following:

Contact person	:	Miguel Pérez
Title	:	Manager Engineering and Planning
Address	:	Road 165, City View Plaza #48
		Suite 700
		Guaynabo, PR 00968
Telephone	:	(787) 810-5757, ext. 4030
Fax	:	(787) 774-5992
e-mail	:	miguel.perez@movistarpr.com
		m.perez@tld.net

Cordially,

Miguel Pérez
Planning and Engineering Manager